

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2011-229-W/S

IN RE:)	FOURTH REQUEST FOR PRODUCTION OF
)	INTERVENORS HAIG POINT CLUB AND
Application of Daufuskie Island Utility)	COMMUNITY ASSOCIATION, MELROSE
Company, Inc. for Approval for Water)	PROPERTY OWNER'S ASSOCIATION AND
and Sewer Rates, Terms and Conditions)	BLOODY POINT PROPERTY OWNER'S
)	ASSOCIATION

TO: G. Trenholm Walker, Esquire, Attorney for Daufuskie Island Utility Company, Inc.:

Haig Point Club and Community Association, Inc. ("HPCCA"), Melrose Property Owner's Association, Inc. ("MPOA"), and Bloody Point Property Owner's Association ("BPPOA") hereby requires Daufuskie Island Utility Company, Inc. ("DIUC" or the "Applicant"), as soon as possible, but no later than twenty (20) days after service hereof, to answer the Fourth Request for Production of Documents in accordance with South Carolina Public Service Commission Rule 103-833. In these Requests for Production, the term "party" is used to designate the Applicant. These Requests for Production shall be deemed to continue until the time of the hearing of the case.

IT IS HEREIN REQUESTED:

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the below Requests for Production shall be labeled using the same numbers as used herein.

- C. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to these Requests for Production in the appropriate sequence.
- D. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- E. That any exhibits be reduced to an 8 1/2" x 11" format.
- F. That, in addition to the signature and verification at the close of each response, the individual responsible for the information contained in each answer be also identified.
- G. That each Request for Production be reproduced at the beginning of the response thereto.
- H. That three (3) copies of the responses to these Requests for Production be provided to the undersigned as soon as possible.
- I. If the response to any Request for Production is that the information requested is not currently available, state when the information requested will become available.
- J. These Requests for Production shall be deemed continuing so as to require you to supplement or amend your responses as any additional information becomes available up to and through the date of the hearing.
- K. If a privilege not to answer is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.
- L. If a refusal to answer a Request for Production is stated on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of man hours and costs required to conduct the search.
- M. Answer each Request for Production on the basis of your entire knowledge, including information in the possession of DIUC, its officers, directors, members, employees, consultants, representatives, attorneys, subsidiaries, and subcontractors.
- N. If any Request for Production cannot be answered in full, answer to the extent possible and specify reasons for inability to answer.

DEFINITIONS

1. AS USED HEREIN, “APPLICANT” SHALL MEAN DAUFUSKIE ISLAND UTILITY COMPANY, INC. (“DIUC”), WITH ITS EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF APPLICANT.
2. AS USED HEREIN, HAIG POINT CLUB AND COMMUNITY ASSOCIATION, INC. SHALL MEAN HPCCA, WITH ITS EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF HPCCA.
3. AS USED HEREIN, MELROSE PROPERTY OWNER’S ASSOCIATION, INC. SHALL MEAN MPOA, WITH ITS EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF MPOA.
4. AS USED HEREIN, BLOODY POINT PROPERTY OWNER’S ASSOCIATION, INC. SHALL MEAN BPPOA, WITH ITS EMPLOYEES, AGENTS, CONSULTANTS, EXPERTS, PARENTS, SUBSIDIARIES, AFFILIATES, AND PARTNER COMPANIES

AND OTHER OPERATIONAL OR FUNCTIONAL UNITS AND ALL OFFICERS, DIRECTORS, EMPLOYEES, AGENTS AND REPRESENTATIVES OF THESE ENTITIES. IT ALSO INCLUDES ALL OTHER PERSONS ACTING ON BEHALF OF BPPOA.

5. PLEASE CONSTRUE "AND" AS WELL AS "OR" EITHER DISJUNCTIVELY OR CONJUNCTIVELY AS NECESSARY TO BRING WITHIN THE SCOPE OF THESE REQUESTS FOR PRODUCTION ANY INFORMATION WHICH MIGHT OTHERWISE BE CONSTRUED OUTSIDE THEIR SCOPE.
6. "DOCUMENT" SHALL MEAN ANY WRITTEN, PRINTED, TYPED, RECORDED, PHOTOGRAPHIC OR OTHER GRAPHIC MATTER OF ANY KIND OR NATURE, AND ALL MECHANICAL AND ELECTRICAL SOUND RECORDINGS AND ANY TRANSCRIPTS THEREOF, AND COMPUTER DATA FILES IN YOUR POSSESSION, CUSTODY, AND/OR CONTROL, OR KNOWN BY YOU TO EXIST; IT SHALL ALSO MEAN ALL COPIES OF DOCUMENTS BY WHATEVER MEANS MADE.
7. "IDENTIFY" OR "IDENTITY" USED WITH REFERENCE TO AN INDIVIDUAL MEANS TO STATE HIS OR HER FULL NAME, PRESENT OR LAST KNOWN ADDRESS, PRESENT OR LAST KNOWN POSITION AND BUSINESS AFFILIATION, AND EMPLOYER, TITLE, AND POSITION AT THE TIME IN QUESTION. IF THE PERSON WAS AN OFFICER, DIRECTOR, TRUSTEE, COMMISSIONER, OR EMPLOYEE OF DIUC, ALSO STATE THE JOB TITLE AND AREAS OF RESPONSIBILITY.
8. "IDENTIFY" OR "IDENTITY" USED WITH REFERENCE TO A WRITING MEANS TO STATE THE DATE, AUTHOR, TYPE OF DOCUMENT (E.G. LETTER, MEMORANDUM, TELEGRAM, CHART, NOTE APPLICATION, ETC.) OR OTHER MEANS OF IDENTIFICATION, AND ITS PRESENT LOCATION OR CUSTODIAN.

IF ANY SUCH DOCUMENT IS NO LONGER IN DIUC'S POSSESSION OR SUBJECT TO THEIR CONTROL, STATE WHAT DISPOSITION WAS MADE OF IT.

9. "YOU" AND "YOURS" INCLUDE DAUFUSKIE ISLAND UTILITY COMPANY, INC., AS DEFINED HEREIN, AND ANY OF ITS MEMBERS, INDIVIDUALLY, WHO HAVE KNOWLEDGE OR CONTROL OF INFORMATION REQUESTED IN THE REQUEST FOR PRODUCTION.
10. "COMPANY" SHALL MEAN DAUFUSKIE ISLAND UTILITY COMPANY, INC.

REQUESTS FOR PRODUCTION

1. Please provide all documents evidencing both the sending and receipt of the payments through which CK Materials, LLC purchased DIUC, as set forth in POA's First Interrogatories No: 1, including without limitation all monthly bank statements and other bank records reflecting payment and/or receipt, cancelled checks, notifications of electronic fund transfers, withdrawal documents, and deposit documents.
2. Please provide a list setting forth all such payments identifying each payment by payor, payee, date and amount.

s/ John F. Beach
John J. Beach
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Attorneys for Haig Point Club and Community
Association, Inc., Melrose Property Owner's
Association, Inc., and Bloody Point Property
Owner's Association

Columbia, South Carolina
May 3, 2012

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2011-229-W/S

RE:)
)
Application of Daufuskie Island Utility)
Company, Inc. for Approval for Water) **CERTIFICATE OF SERVICE**
and Sewer Rates, Terms and)
Conditions)

This is to certify that I have caused to be served this day the **Fourth Request for Production** of Haig Point Club and Community Association, Inc. ("HPCCA"), Melrose Property Owner's Association, Inc. ("MPOA"), and Bloody Point Property Owner's Association ("BPPOA") via electronic mail service as follows:

Shannon Bowyer Hudson, Esquire
Nannette S. Edwards, Esquire
Courtney Dare Edwards, Esquire
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s/ Carol Roof
Carol Roof

May 3, 2012
Columbia, South Carolina